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5 *Attorney for Defendant Taj Thompson*

6  
7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**  
9

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 TAJ KEVON THOMPSON, et al.,

14 Defendants.

Case No. 2:16-cr-230-GMN-CWH

**UNOPPOSED MOTION TO CONDUCT A**  
**PRE-PLEA, PRE-SENTENCE**  
**INVESTIGATION REPORT AND**  
**PROPOSED ORDER**

15  
16 This is Defendant Taj Thompson's unopposed motion to conduct a pre-plea pre-sentence  
17 investigation report.

18 On July 27, 2016, Mr. Thompson was charged by indictment with conspiracy to distribute a  
19 controlled substance in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(C), and 846. The parties are  
20 attempting to negotiate this case. A pre-plea investigation will aid in addressing unclear state court  
21 dispositions as regards Mr. Thompson's potential sentencing guideline calculation. Mr.  
22 Thompson's criminal history calculation and his sentencing guideline range will necessarily affect  
23 the outcome and disposition of the case and/or potential negotiations. The parties are unable to  
24 definitively determine Mr. Thompson's sentencing guideline range without knowing his entire  
25 criminal history and therefore a pre-plea pre-sentence investigation report is requested.

26 To satisfy Mr. Thompson's concerns and to assure that he has the information he needs to  
27 make a truly knowing and intelligent decision whether to accept or reject a plea offer, he has  
28 requested that a pre-plea pre-sentence investigation report be completed. On June 19, 2017,

1 undersigned counsel conferred with the government, which does not oppose this motion. Trial in  
2 this matter is set for November 13, 2017.

3 For the reasons stated above, Mr. Thompson respectfully requests that a pre-plea pre-  
4 sentence investigation report be conducted in this matter.

5 DATED This 27<sup>th</sup> day of June, 2017.

6 **WOLF, RIFKIN, SHAPIRO,**  
7 **SCHULMAN & RABKIN, LLP**

8 By: /s/ Daniel J. Hill  
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10 UNITED STATES OF AMERICA,

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14 Defendants.

Case No. 2:16-cr-230-GMN-CWH

**ORDER**

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16 Good cause appearing, the government having no opposition, and the best interests of justice  
17 and judicial economy being served,

18 **IT IS HEREBY ORDERED** that Defendant Taj Kevon Thompson's Unopposed Motion  
19 for Pre-Plea Presentence Investigation Report (ECF No. 114) is **GRANTED**.

20 **IT IS FURTHER ORDERED** that the U.S. Probation Office shall prepare and provide to  
21 the Court by no later than August 28, 2017, a Pre-Plea Presentence Investigation Report with the  
22 guideline calculation requested for Defendant Taj Kevon Thompson's **criminal history only**.

23  
24  
25 DATED this 29 day of June, 2017.

26   
27 GLORIA M. NAVARRO, CHIEF JUDGE  
28 UNITED STATES DISTRICT COURT

**CERTIFICATE OF SERVICE**

I hereby certify that on this 27<sup>th</sup> day of June, 2017, a true and correct copy of **UNOPPOSED MOTION TO CONDUCT A PRE-PLEA, PRE-SENTENCE INVESTIGATION REPORT AND PROPOSED ORDER** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/ Jennifer Finley  
Jennifer Finley, an Employee of  
WOLF, RIFKIN, SHAPIRO,  
SCHULMAN & RABKIN, LLP